

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

VS.

LIREN LAI

§
§
§
§
§

NO. 4:25-MJ-00404-2

MOTION TO SUBSTITUTE COUNSEL

TO THE HONORABLE JUDGE PETER BRAY, UNITED STATES
MAGISTRATE JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS,
HOUSTON DIVISION:

COMES NOW, LIREN LAI, Defendant in the above-entitled and numbered
cause, and respectfully makes known to the Court that the Defendant desires to
substitute Kent A. Schaffer, of 1001 McKinney Street, Suite 1600, Houston, Texas
77002, as his counsel in place of Matt Hennessy, of 700 Louisiana, Suite 2300,
Houston, Texas 77002 in the above cause.

I.

This motion is not for the purpose of delay but in order that the record reflect
Defendant's duly retained counsel of record and no injustice, prejudice, or
obstruction of court procedure will be caused by the substitution.

WHEREFORE PREMISES CONSIDERED, the Defendant prays that this
Honorable Court will grant this Motion and Order that Kent A. Schaffer be
substituted for Matt Hennessy as Defendant's attorney of record in the above-entitled

and numbered cause.

Respectfully submitted,

/s/ Kent A. Schaffer

KENT A. SCHAFFER

Federal ID No. 3603

TBA No. 17724300

1001 McKinney Street, Suite 1600

Houston, Texas 77002

Telephone: (713) 228-8500

Facsimile: (713) 228-0034

Email: KentSchaffer@gmail.com

Attorney for Defendant,

LIREN LAI

APPROVED BY COUNSEL:

*/s/ Matt Hennessy

MATT HENNESSY

TBA No. 00787677

700 Louisiana, Suite 2300

Houston, Texas 77002

Telephone: (713) 224-4400

Facsimile: (713) 224-5153

Email: mhennessy@ghmfirm.com

*SIGNED WITH PERMISSION

CERTIFICATE OF CONFERENCE

Counsel for Defendant conferred with AUSA Jason Marchand concerning his position on Defendant's Motion to Substitute Counsel and he advised that he is unopposed to this motion.

/s/ Kent A. Schaffer

KENT A. SCHAFFER

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2025, I electronically filed the foregoing Motion with the clerk of the court for the U.S. District Court, Southern District of Texas. I hereby certify that I have served the motion on all counsel and/or parties of record.

/s/ Kent A. Schaffer

KENT A. SCHAFFER